

Comment on Emergency Rulemaking Proposal (Slate Cards)

Conner Edwards reported via email
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Commissioners:

The purpose of this e-mail is to comment on the PDC's emergency rulemaking proposal regarding slate cards.

This emergency rulemaking proposal is inappropriate. The normal rulemaking process should be allowed to run its normal course.

RCW 34.05.350(1) provides that emergency rulemaking is appropriate when the agency for good cause finds: **"[t]hat immediate adoption, amendment, or repeal of a rule is necessary for the preservation of the public health, safety, or general welfare, and that observing the time requirements of notice and opportunity to comment upon adoption of a permanent rule would be contrary to the public interest"**.

Put simply, emergency rulemaking (with its shortened time frame for public notification, consideration, and participation) is for emergencies. Changing a rule which has been on the books for decades hardly qualifies as an emergency.

It is not appropriate for the PDC to use emergency rulemaking as a tool to rush through desired changes for the state's dominant political party.

Bending the rules for the party which writes the state's budget is not a good look for an ostensibly nonpartisan, independent enforcer of our state's campaign finance laws.

Emergency rulemaking is not appropriate here. Please reject the staff's emergency proposal and allow the normal rulemaking process to run its course.

Best,

Conner Edwards
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